

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

August 29, 2018

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs"), with agreement from counsel for Defendants Al-Obaid, Al-Turki, Basha, Naseef, and Al-Buthe ("the Charity Official Defendants"), request a 30-day extension of the time to file a joint letter pursuant to Your Honor's Order at ECF No. 4043 (entered July 6, 2018). In that Order, Your Honor directed that "[w]ithin 60 days of [July 6, 2018], the parties shall file a joint status letter indicating whether they have agreed upon the attorneys' fees and costs that should be imposed [on the Charity Official Defendants]. If the parties have not reached agreement, the status letter should propose a reasonable schedule for briefing on the amount of the attorneys' fees and costs."

Whereas the parties are continuing to negotiate toward resolving the value of the fees and costs to be assessed and are hopeful that an additional 30 days will obviate the need for the Court's involvement, we ask that the Court extend the date for the submission of a joint letter from Tuesday, September 4, 2018 to Thursday, October 4, 2018.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Robert T. Haeefe

ROBERT T. HAEFELE

For the Plaintiffs Exec. Committees

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF